

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE UNIVERSITY,

Plaintiff,

vs.

STMICROELECTRONICS INTERNATIONAL N.V.,
ET AL.,

Defendants.

No. 6:21–CV–727–ADA

JURY TRIAL DEMANDED

DEFENDANTS’ NOTICE OF RULE 30(B)(6) DEPOSITION OF PLAINTIFF

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants STMicroelectronics International N.V. and STMicroelectronics, Inc. (collectively, “ST”) will take the oral deposition of Plaintiff The Trustees of Purdue University (“Purdue”) on the topics listed below on an agreed upon date and time. Under Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs must designate one or more officers, directors, managing agents, or other persons who consent to testify on its behalf regarding the following subjects, and should set out the matters on which each person designated will testify. The person(s) so designated must testify about information known or reasonably available to Plaintiff, as well all Purdue Affiliated Parties. The deposition will take place at the offices of Holland & Knight, 1722 Routh Street, Suite 1500, Dallas, Texas 75201 or at a mutually agreed upon location. The deposition will be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The depositions will be stenographically recorded and videotaped and will continue from day to day until completed.

20. Your development and fabrication of MOSFET products or devices, including silicon and silicon carbide MOSFETs.

21. The role of PRF with respect to the Patent-in-Suit and this Lawsuit, including PRF's role with respect to licensing the Patent-in-Suit and PRF's financial interest in the Patent-in-Suit and this Litigation.

22. Your history of licensing IP, including Your policies, procedures, template license agreements, deal flow and approval, and royalty rates for IP related to semiconductor technology.

23. Any evaluation, analysis, or consideration by or for Plaintiff of the markets for silicon carbide semiconductor products including, but not limited to, SiC MOSFETs.

24. The factual bases for Your contention that any Asserted Claim is directly or indirectly infringed by ST.

25. The factual bases for Your contention that ST has willfully infringed any Asserted Claim.

26. The factual bases for what You contend is the appropriate royalty rate for a license to the Patent-in-Suit.

27. The identity and role of the individuals that would have negotiated a license to the Patent-in-Suit in November 2013.

28. Any efforts related to the preservation, search, collection, and production of documents responsive to ST's requests for production in this action.

29. Your awareness of island-shaped base contacts in semiconductor power devices prior to March 3, 2009, including all documents in your possession, custody, or control referring to any such structure.

October 28, 2022

Respectfully submitted:

By: /s/ Justin S. Cohen

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